



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

NICHOLAS TRUTANICH
United States Attorney
DANIEL CLARKSON
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-6418
daniel.clarkson@usdoj.gov

Attorneys for the United States

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
MAR 10 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ETHAN ELLIOT ERHARDT and
BORIS TRGOVCEVIC,

Defendants.

**SEALED SUPERSEDING
CRIMINAL INDICTMENT**

2:19-cr-00249-JCM-BNW

VIOLATIONS:

Engaging in the Business of Dealing in
Firearms Without a License
18 U.S.C. § 922(a)(1)(A) and 2

Illegal Acquisition of a Firearm
18 U.S.C. §§ 922(a)(6), 924(a)(2), and 2

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Engaging in the Business of Dealing Firearms Without a License)

Beginning on a date unknown but no later than December 18, 2018, and continuing to on or
about February 19, 2019, in the State and Federal District of Nevada,

**ETHAN ELLIOT ERHARDT, and
BORIS TRGOVCEVIC,**

defendants herein, aiding and abetting each other, not being a licensed dealer, importer, and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, all in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), 924(a)(1)(D), and 2.

COUNT TWO

(Illegal Acquisition of a Firearm)

On or about February 19, 2019, in the State and Federal District of Nevada,

**ETHAN ELLIOT ERHARDT, and
BORIS TRGOVCEVIC,**

defendants herein, aiding and abetting each other, in connection with the acquisition of firearms, to wit: 10 Fabrique Nationale Herstal (FN), M249S, 5.56 caliber rifles, bearing serial numbers M249SA01897, M249SA02436, M249SA05447, M249SA07101, M249SA07099, M249SA07141, M249SA07111, M249SA07588, M249SA07367, M249SA07431; from "Green Valley Range," a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false and fictitious written statement to "Green Valley Range," which statement was intended and likely to deceive "Green Valley Range" as to a fact material to the lawfulness of the sale of said firearms under Chapter 44 of Title 18, United States Code, in that ETHAN ELLIOT ERHARDT did complete and execute, and BORIS TRGOVCEVIC caused ETHAN ELLIOT ERHARDT to complete and execute, a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein defendants represented that ETHAN ELLIOT ERHARDT was the actual transferee/buyer of the

1 firearms, when in fact, ETHAN ELLIOT ERHARDT was not the actual transferee/buyer of the
2 firearms, all in violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

3 **DATED:** this 10th day of March, 2020.

4 **A TRUE BILL:**

5
6 /S/
7 FOREPERSON OF THE GRAND JURY

8
9 NICHOLAS TRUTANICH
United States Attorney

10 
11 DANIEL CLARKSON
12 Assistant United States Attorney